

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE BIOPURE CORPORATION
SECURITIES LITIGATION

Civ. No. 03-12628 -NG

MOTION TO ADMIT COUNSEL *PRO HAC VICE*

Pursuant to Local Rule 83.5.3, the undersigned counsel, Theodore M. Hess-Mahan, hereby moves that this Court enter an Order granting leave to Howard T. Longman, and Jules Brody of Stull, Stull & Brody, 6 East 45th Street, New York, NY 10017, (212) 687-7230, to appear on behalf of the lead plaintiffs and practice before this Court in the above-captioned action.

As grounds for this motion, the undersigned represents the following:

1. Howard T. Longman is and has been a member in good standing of the bar of the State of New York since 1983. In addition, Mr. Longman has also been admitted in the following jurisdictions: United States District Courts for the Southern and Eastern Districts of New York.
2. There are no disciplinary proceedings pending against Mr. Longman as a member of the bar in any jurisdiction.
3. Mr. Longman has represented to the undersigned counsel that he is familiar with the Local Rules of the United States District Court for the District of Massachusetts.
4. In further support of this motion, Mr. Longman has submitted herewith his Certificate of Good Standing as Required by Local Rule 83.5.3.

5. Jules Brody is and has been a member in good standing of the bar of the State of New York since 1964.

6. There are no disciplinary proceedings pending against Mr. Brody as a member of the bar in any jurisdiction.

7. Mr. Brody has represented to the undersigned counsel that he is familiar with the Local Rules of the United States District Court for the District of Massachusetts.

8. In further support of this motion, Mr. Brody has submitted herewith his Certificate of Good Standing as Required by Local Rule 83.5.3.

WHEREFORE, the undersigned counsel respectfully moves that Messrs. Longman and Brody be admitted to practice before this Court *pro hac vice*.

Dated: January 20, 2006 Respectfully submitted,

SHAPIRO HABER & URMY LLP

/s/Theodore M. Hess-Mahan

Edward F. Haber BBO #215620

Theodore M. Hess-Mahan BBO #557109

Matthew L. Tuccillo BBO # 643336

53 State Street

Boston, MA 02109

(617) 439-3939

Co-Counsel for Lead Plaintiff and the Class

CERTIFICATION OF COMPLIANCE WITH LOCAL RULE 7.1(A)(2)

I hereby certify that the parties' counsel have conferred in a good faith effort to narrow or resolve the issues raised in this motion. Defendants, through their counsel, do not object to the relief requested herein.

/s/Theodore M. Hess-Mahan

Theodore M. Hess-Mahan